

## ATTACHMENT B

### INFORMATION REQUEST REGARDING WIRELESS-WIRELINE COMPETITION ISSUES JUNE 30, 2004

For purposes of the following request, the following definitions and instructions apply:

1. The term “documents” means written or graphic materials in the possession, custody, or control of AT&T Wireless and Cingular. The term “documents” includes hardcopy and electronic copies of correspondence, drafts, spreadsheet and database analyses, analyses, reports, memos and presentations created, revised or distributed within AT&T Wireless and Cingular.
2. The term “Relevant Area” means,
  - a. Any state in which AT&T Wireless and Cingular owns, manages, or controls a CMRS license, and
  - b. Any state in which BellSouth or SBC operates as a local exchange carrier.
3. The term “Relevant Service” means,
  - a. Mobile wireless services
  - b. Mobile wireless data services
  - c. Mobile wireless voice services.
4. The term “Cable Modem Service” means a service that uses cable system facilities to provide customers with high-speed internet access, as well as many applications or functions that can be used with high-speed Internet access.
5. Unless otherwise specified, each of the requests calls for documents for each of the years from January 1, 2003 to the present.
6. The response to this request shall be submitted in the following manner:
  - a. Documents shall be complete and, unless privileged, unredacted, submitted as found in the AT&T Wireless’s and Cingular’s files.
  - b. AT&T Wireless and Cingular should submit photocopies (with color photocopies where necessary to interpret the document), in lieu of original documents.
  - c. Documents submitted shall be produced by request. Mark each page with a corporate identification and consecutive document control numbers. Place all documents produced in file folders, and mark each folder with corporate identification, the name of the person whose documents are in the folder how the original file was labeled, and which request that documents responds to; provide equivalent information for documents provided in electronic form.
  - d. Provide a master list showing: (a) the name of each person from whom responsive documents are submitted; and (b) the corresponding consecutive document control number(s) used to identify the person’s documents.
7. You are to search the files of the following individuals for documents responsive to these requests.
  - a. SBC
    1. Eric Boyer (VP – Consumer Product Integration)
    2. Chris Koch (Dir. Strategic Marketing)
    3. Amy Bruns (Exec. Dir. Strategic Marketing (Consumer))

Information Request Regarding Wireless-Wireline Competition Issues  
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June 30, 2004

4. Christine Urbanek (Asst. VP Research and Analysis)
  5. James Carter (Exec. Dir. Research and Analysis)
  6. Rachel Hackett (Exec. Dir. Strategic Initiatives)
  7. Elizabeth Hart (Dir. Emerging Products)
  8. Maureen Sahyoni (Dir. Cingular)
  9. Lori Jolley (Dir., Cingular Alliance)
  10. Gordon Brown (Ex Dir. Cingular Alliance)
  11. James Levering (Exec. Dir. Competitive Analysis)
  12. Brooks McCorcle (VP, Consumer Marketing)
  13. Linda Muscat (Dir. Channel Delivery and Winback)
  14. Kevin Porter (Corporate Strategy)
  15. Jon Blinkiewicz (Dir – Package/bundles)
  16. Scott Velting (Exec. Dir.– Packaging and Bundling)
- b. BellSouth
1. Bob Arnold (VP- Pricing, Strategic Pricing and Voice Product Management)
  2. Tim Barnes (Director-Strategy Planning and Analysis, in marketing)
  3. Bill Smith (Chief Tech Officer)
  4. Barry Boniface (VP Corporate Development, VP Planning and Development)
  5. Michael Bowling (VP Broadband Service, in LD and Product Management)
  6. Douglas Bulleit (Chief Strategist, Corporate Development)
  7. Dan Csont (Director, Strategic Planning and Voice Prod. Management (in Marketing))
  8. Cindy Hamrin (VP, Alliance Management)
  9. John Irwin (VP, SBS Segment Marketing, in Marketing)
  10. Donna Lee (Chief Marketing Officer)
  11. Pam Jones (VP, Consumer Segment Marketing)
  12. Paul Edwards (Director, Wireless, in consumer segment marketing)
  13. Don Livingston (Sr. Director, Consumer Segment Marketing)
  14. Elizabeth Luckey, (Manager, Strategic Pricing and Voice Product Management, in marketing)
  15. Ainsley Sadlow (Dir. Strategic Pricing)
  16. Brian Collins (Director, Bundles in Consumer marketing)
  17. Missy McCue (Director, Bundle Development/Wireless BAPCO, in Marketing)
  18. Eric Wolbach (Director of Wireless Services, Wireless/Wireline Integration in LD and Product Management and Development)
  19. Ellen Mitchell (VP- Integrated Marketing)
  20. David Rittiner (Director of Demand Forecasting)
  21. Maggie Robinson-Hatfield (Sr. Director, Research)
  22. Stephen Sherman (Director, Cingular Alliance)
  23. Derek Walker (Dir. Strategic Planning, Corporate Development)
- c. Cingular
1. William Clift (Chief Tech. Officer)
  2. Marc Lefar (Chief Marketing Officer)
  3. Mitchell Ferber (Marketing Director)
  4. Karen Bennett (VP Product Develop and Bus. Transform)
  5. Christopher Dowd (VP Product Development)
  6. Ryan Jones (VP Product Development)
  7. Elizabeth Hill (Ex. Dir. – Marketing – Prod. Development)

8. Andrew Wilson (VP Marketing)
9. James Glass (VP Finance)
  
- d. AT&T Wireless
  1. Mike Sievert (Exec. VP, Chief Marketing Officer)
  2. Sarah Pan, (Dir. Strategic Planning)
  3. Rob Griffin (Dir. Strategic Financial Planning)
  4. Suzi White (Interim Director - Customer Lifecycle Management Team)
  5. Jan Vitek (Prog. Management Director – Customer Lifecycle Management Team)
  6. Michael Harstrick (Customer Lifecycle Management Team)
  7. Thomas Enraght-Moony (Business Ldr, Consumer Direct, Consumer /Partnership Direct Team)
  8. Mike Attiyeh (Dir. Consumer Product Management)
  9. Susan Kosanke (VP Finance and Wireless Ops)
  10. Shane Miller (Dir. Transition, Marketing and Pricing)
  11. Gary Corley (Dir. Transition, Rev. and Post Launch)
  12. Mike Tempora (VP Consumer Product Management)
  13. Len Kubik (Proj. Manager Wireline Replacement)
  14. Emmy Packard-Levine (Sr. Manager – Cross Product Operations)
  15. Tim Finnegan (VP Partnership Marketing)
  16. John Tinter (VP Market Strategy)
  17. John Burbank (VP Consumer Marketing)

Document Request:

1. Provide all documents relating to competition between local telephone service and the provision of any relevant service in any relevant area, including, but not limited to, market studies, analyses, forecasts and surveys relating to:
  - a. The loss of local telephone service customers to mobile wireless service and any attempts to win these customers back from mobile wireless service providers or to stem losses of these customers to mobile wireless services, including, but not limited to,
    - i. Data or studies indicating that local telephone service customers have disconnected their local telephone service and are using a mobile wireless service in lieu of local telephone service (including, but not limited to figures on subscribers lost or gained).
  - b. How consumer or business customers or competitors view or perceive the offering of a bundled offering that includes local telephone service and wireless service offered by your company or any other carrier (including the impact of not offering a wireless service or the impact of pricing on decisions to take local telephone service or any relevant service). A bundle of services includes, but is not limited to, services billed on one bill or service for which a discount is received if purchased with other services, even if the customer is billed separately for each service.
  - c. Any actual or potential effect on the supply, demand, cost or price of any relevant service as a result of competition from other services including, but not limited to local telephone service (including DSL or other data services), Wi-Fi, and cable modem service, regarded by customers as a potential substitute.

- d. Any actual or potential effect on the supply, demand, cost or price of any local telephone service (including DSL or other data services) as a result of competition from other services, including, but not limited to any relevant service, Wi-Fi, and cable modem service, regarded by customers as a potential substitute.
  - e. The effect local number portability on your company, competitors, or on competition in any relevant service in any relevant areas and on competition for local telephone service, long distance phone service, or any combination of these services sold together or with any relevant service.
2. Provide all documents relating to pricing plans, pricing policies, pricing forecasts, pricing strategies, pricing analyses, and pricing decisions that consider the effects of actual or potential competition between any relevant service and any local telephone service (including DSL or other data services) or cable modem service within any relevant area.
3. Provide all plans, studies, strategies, policies, corporate goals, or contracts in which you have proposed or offered mobile wireless services bundled with local telephone service, including the effect on your company's or any other person's plans to offer or provide a mobile wireless service bundled with local telephone service or on your company's or any other company's competitive position in local telephone service, including, but not limited to, any change in churn rates, market shares, or revenues attributed to any loss or gain in customers. A bundle of services includes, but is not limited to, services billed on one bill or service for which a discount is received if purchased with other services, even if the customer is billed separately for each service.
4. Provide all documents that refer to, discuss, evaluate or compare the advantages and disadvantages of local telephone service (DSL or other data services) or cable modem services to different wireless technology platforms (*e.g.*, TDMA, CDMA, GSM, ixRTT, eDGE, GRRS, VMTS, and EV-DO/DV), including, but not limited to analysis of spectral efficiency and spectral capacity, discussions of technological developments for particular technology platforms, the evolutionary path to an improved or "next generation" technology platform, cost and pricing considerations, acceptance of and projections of the number of customers that are likely to subscribe to each relevant service based upon different technology platforms, and price premiums that might be obtained by offering any relevant services based on a particular technology platform.